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A PARTNERSHIP INCLUDING PROFESSIONAL CORPORATIONS

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WRITER'S DIRECT NUMBER

February 6, 1998

The Honorable Margaret P. Crenshaw  
Secretary  
Postal Rate Commission  
1333 H Street, N.W.  
Washington, DC 20268-0001

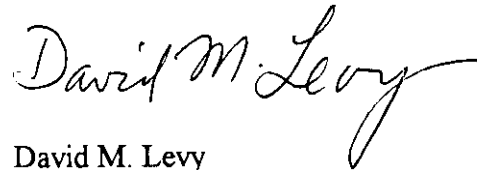
RECEIVED  
FEB 6 4 36 PM '98  
FBI - NEW YORK

Re: Docket No. R97-1

Dear Ms. Crenshaw:

Enclosed for filing are the corrected responses of the Alliance of Nonprofit Mailers to USPS Interrogatories USPS/ANM-1 through -34. These supersede the version filed yesterday, which contained a number of errors, most notably omission of the table attached to ANM's response to USPS/ANM-1.

Very truly yours,



David M. Levy

*Counsel for Alliance of Nonprofit Mailers*

cc: All parties of record

BEFORE THE  
POSTAL RATE COMMISSION  
WASHINGTON, DC 20268-0001

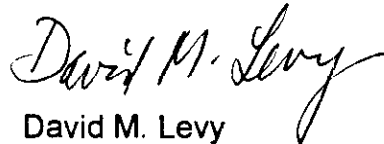
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Docket No. R97-1  
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Postal Rate And Fee Changes, 1997  
—

**RESPONSE OF THE ALLIANCE OF NONPROFIT MAILERS  
TO INTERROGATORIES USPS/ANM-1 THROUGH -34**  
[corrected February 6, 1998]

The Alliance of Nonprofit Mailers hereby provides responses to interrogatories USPS/ANM-1 through -34. Each interrogatory is stated verbatim and followed by a response.

Respectfully submitted,



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*Counsel for Alliance of Nonprofit Mailers*

February 6, 1998

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OFFICE OF THE ATTORNEY GENERAL

**RESPONSE OF THE ALLIANCE OF NONPROFIT MAILERS  
TO INTERROGATORY USPS/ANM-1  
[corrected February 6, 1998]**

USPS/ANM-1. *For each year fiscal year (or calendar year if fiscal year is unavailable) from 1986 to present, please provide a list of publications published by each member of your trade association and mailed at second-class regular or periodical regular rates.*

**RESPONSE**

ANM does not have the requested information (beyond any responsive information that ANM has previously submitted to the Postal Service in rate and classification cases since 1986). Nonprofit mailers are not asked to provide such information as a condition of membership in ANM. However, in an attempt to be partially responsive, a listing of ANM members is attached. Information about the entire universe of publications entered at second-class or periodical regular rates -- not just the subset entered by ANM members -- should be available on mailing statements in the possession of the Postal Service.

**RESPONSE OF THE ALLIANCE OF NONPROFIT MAILERS  
TO INTERROGATORY USPS/ANM-1  
[corrected February 6, 1998]**

***ALLIANCE MEMBERS***

*as of January 23, 1998*

Adelphi University  
Aerospace America Magazine  
Air Force Association  
Alabama Baptist, Inc.  
ALSAC-St. Jude Children's  
Research Hospital  
Amateur Softball Association  
American Academy of Medical  
Administrators  
American Academy of  
Otolaryngology-Head and  
Neck Surgery  
American Arts Alliance  
American Association for the  
Advancement of Science  
American Ass'n of Clinical  
Chemistry  
American Ass'n of Individual  
Investors  
American Ass'n of Museums  
American Association of  
Physics Teachers  
American Association of  
Retired Persons  
American Cancer Society  
American College of Healthcare  
Executives  
American College of OB/GYN  
American College of Sports  
Medicine  
American Council on Education  
American Council on Exercise  
American Dental Association  
American Diabetes Association  
American Farm Bureau  
Federation  
American Institute of Chemical  
Engineers  
American Jewish Press Ass'n  
American Library Association  
American Lung Association  
American Management Ass'n  
American Mathematical Society

American Medical Association  
American Museum of Natural  
History  
American Planning Association  
American Prospect  
American Public Power Ass'n  
American Quarter Horse Ass'n  
American Society of  
Association Executives  
American Society of Clinical  
Pathologists  
American Sociological  
Association  
American Symphony Orchestra  
League  
America's Public Television  
Stations  
Anti-Cruelty Society  
Arthritis Foundation  
Association of American  
University Presses  
Association of Brewers  
Ass'n of Christian Schools Int'l  
Ass'n of College Unions Int'l  
Ass'n for Investment  
Management and Research  
Ass'n of the Miraculous Medal  
Ass'n of Performing Arts  
Presenters  
Association of the U.S. Army  
Baptist General Conv. of TX  
Bethesda Lutheran Homes and  
Services, Inc.  
B'nai B'rith International  
Boys & Girls Clubs of America  
Boysville of Michigan, Inc.  
California Alumni Association  
California Farm Bureau  
Federation  
CARE  
Catholic Press Association  
Center for Science in the Public  
Interest

Chesapeake Bay Foundation  
Child Welfare League of  
America  
Children International  
Children of the Night  
Chosen People Ministries  
Citizens for a Sound Economy  
Foundation  
CO-OP AMERICA  
Columbia University  
Company, A Jesuit Magazine  
Compassion International, Inc.  
Consumers Union of US, Inc.  
Crohn's & Colitis Foundation  
of America, Inc.  
Detroit Institute of Arts  
Founders Society  
Disabled American Veterans  
Divers Alert Network  
Edmundite Missions  
Elks Magazine  
The Endocrine Society  
Fletcher Allen Health Care  
Florida State Elks Association  
Foundation for National  
Progress  
Franciscan Mission Associates  
Franciscan Missionary Union  
Franciscan Province of the  
Sacred Heart  
Fraternal Order of Eagles  
General Conference of Seventh-  
day Adventists  
Geological Society of America  
Guideposts Associates-Peale  
Center for Christian Living  
Harper College  
Harper's Magazine  
Hazelden Foundation  
Healthcare Financial Mgt Ass'n  
Illinois Central College  
Illinois Farm Bureau  
Illinois State University

**RESPONSE OF THE ALLIANCE OF NONPROFIT MAILERS  
TO INTERROGATORY USPS/ANM-1  
[corrected February 6, 1998]**

Institute of Electrical and  
Electronic Engineers  
International and American  
Ass'ns for Dental Research  
International Association of  
Fire Fighters (AFL-CIO)  
International City/County  
Management Association  
Izaak Walton League of  
America  
Jewish Braille Institute of  
America, Inc.  
Jewish National Fund  
Juvenile Diabetes Foundation  
Little City Foundation  
Manhattan School of Music  
March of Dimes Birth Defects  
Foundation  
Marian Helpers Center  
Maryknoll Fathers and Brothers  
Massachusetts Bar Institute  
Minnesota Public Radio  
Missouri Baptist Convention  
Missouri State Teachers Ass'n  
Moose International  
Multiple Sclerosis Foundation  
National Association of College  
and Univ. Business Officers  
National Association of Counties  
Research Foundation  
National Association of Homes  
and Services for Children  
National Association of  
Purchasing Management  
National Association of Watch  
and Clock Collectors, Inc.  
National Audubon Society  
National Catholic Development  
Conference  
National Committee to Preserve  
Social Security and Medicare  
National Council of Senior  
Citizens  
National Easter Seal Society  
National Forensic League  
National Geographic Society  
National Grange

National Parkinson Foundation  
National Public Radio  
National Right to Life  
Committee  
National Rural Electric Coop  
National School Board Ass'n  
National Society of Fund  
Raising Executives  
National Trust for Historic  
Preservation  
National University Continuing  
Education Association  
Navigators  
Navy League of the U.S.  
New England Journal of  
Medicine  
New York Society of Certified  
Public Accountants  
Northern Arizona University  
Northwestern University  
Oklahoma State University  
Optical Society of America  
Oregon State University  
Paralyzed Veterans of America  
Penn State Geisinger Health  
System  
Pennsylvania Bar Association  
Plainedge Public Library  
Portland Marathon  
The Progressive  
Public Broadcasting Service  
Redleaf Press - Resources for  
Child Care  
Reserve Officers Ass'n of US  
Road Runners Club of America  
Rockhurst College Continuing  
Education Center  
Rutgers University  
Saint Joseph Corporation -  
Catholic Diocese-Green Bay  
Saint Joseph's Indian School  
Saint Labre Indian School  
Educational Association  
Saint Meinrad Archabbey  
Salvation Army  
Sierra Magazine  
Sisters of Providence Health

System  
Society of American Military  
Engineers  
Society of Automotive  
Engineers  
SPIE - International Society for  
Optical Engineering  
Support Center of Washington  
Supreme Council, Scottish Rite  
Northern Masonic  
United Methodist Publishing  
House  
Union of American Hebrew  
Congregations  
United Service Organizations,  
Inc. (USO)  
United States Sailing Ass'n  
Unity School of Christianity  
University Continuing  
Education Association  
University of California -  
Los Angeles  
University of California Press  
Journals  
University of Chicago Press  
University of Idaho  
University of Kansas  
University of Maine  
University of Missouri-Columbia  
University of North Carolina -  
Charlotte  
University of Oklahoma  
University of Southern  
California Magazines  
University of Texas Medical  
Branch  
US Naval Institute  
Utah State University  
Wake Forest University Baptist  
Medical Center  
Walk Thru the Bible Ministries  
Wolf Trap Foundation for the  
Performing Arts  
World Wildlife Fund  
YMCA of the USA

**RESPONSE OF ALLIANCE OF NONPROFIT MAILERS  
TO INTERROGATORIES OF UNITED STATES POSTAL SERVICE**  
[corrected February 6, 1998]

USPS/ANM-2. For each fiscal year (or calendar year if fiscal year is unavailable) from 1986 to present, please for each publication listed in response to interrogatory number 1 the following information:

- (a) The number of issues mailed.
- (b) The average number of editions (versions) per issue.
- (c) An indication of the kind or type of each version.

**RESPONSE**

ANM does not have the requested information (beyond any responsive information that ANM has previously submitted to the Postal Service in rate and classification cases since 1986). Nonprofit mailers are not asked to provide such information as a condition of membership in ANM. Responsive information for the entire universe of publications entered at second-class or periodical regular rates -- not just the subset entered by ANM members -- should be available on mailing statements in the possession of the Postal Service.

**RESPONSE OF ALLIANCE OF NONPROFIT MAILERS  
TO INTERROGATORIES OF UNITED STATES POSTAL SERVICE**  
[corrected February 6, 1998]

USPS/ANM-3. For each fiscal year (or calendar year if fiscal year is unavailable) from 1986 to present, please provide the total volumes mailed at second-class regular or periodical regular rates for each publication listed in response to interrogatory number 1.

**RESPONSE**

ANM does not have the requested information (beyond any responsive information that ANM has previously submitted to the Postal Service in rate and classification cases since 1986). Nonprofit mailers are not asked to provide such information as a condition of membership in ANM. Responsive information for the entire universe of publications entered at second-class or periodical regular rates -- not just the subset entered by ANM members -- should be available on mailing statements in the possession of the Postal Service.

**RESPONSE OF ALLIANCE OF NONPROFIT MAILERS  
TO INTERROGATORIES OF UNITED STATES POSTAL SERVICE**  
[corrected February 6, 1998]

USPS/ANM-4. For each fiscal year (or calendar year if fiscal year is unavailable) from 1986 to present, please provide the volumes mailed at second-class regular or periodical regular required presort rates for each publication listed in response to interrogatory number 1.

**RESPONSE**

ANM does not have the requested information (beyond any responsive information that ANM has previously submitted to the Postal Service in rate and classification cases since 1986). Nonprofit mailers are not asked to provide such information as a condition of membership in ANM. Responsive information for the entire universe of publications entered at second-class or periodical regular rates -- not just the subset entered by ANM members -- should be available on mailing statements in the possession of the Postal Service.

**RESPONSE OF ALLIANCE OF NONPROFIT MAILERS  
TO INTERROGATORIES OF UNITED STATES POSTAL SERVICE**  
[corrected February 6, 1998]

USPS/ANM-5. For each fiscal year (or calendar year if fiscal year is unavailable) from 1986 to present, please provide the volumes mailed at second-class regular or periodical regular 3-digit city/5-digit presort rates for each publication listed in response to interrogatory number 1.

**RESPONSE**

ANM does not have the requested information (beyond any responsive information that ANM has previously submitted to the Postal Service in rate and classification cases since 1986). Nonprofit mailers are not asked to provide such information as a condition of membership in ANM. Responsive information for the entire universe of publications entered at second-class or periodical regular rates -- not just the subset entered by ANM members -- should be available on mailing statements in the possession of the Postal Service.

**RESPONSE OF ALLIANCE OF NONPROFIT MAILERS  
TO INTERROGATORIES OF UNITED STATES POSTAL SERVICE**  
[corrected February 6, 1998]

USPS/ANM-6. For each fiscal year (or calendar year if fiscal year is unavailable) from 1986 to present, please provide the volumes mailed at second-class regular or periodical regular carrier route presort rates for each publication listed in response to interrogatory number 1.

**RESPONSE**

ANM does not have the requested information (beyond any responsive information that ANM has previously submitted to the Postal Service in rate and classification cases since 1986). Nonprofit mailers are not asked to provide such information as a condition of membership in ANM. Responsive information for the entire universe of publications entered at second-class or periodical regular rates -- not just the subset entered by ANM members -- should be available on mailing statements in the possession of the Postal Service.

**RESPONSE OF ALLIANCE OF NONPROFIT MAILERS  
TO INTERROGATORIES OF UNITED STATES POSTAL SERVICE  
[corrected February 6, 1998]**

USPS/ANM-7. For each fiscal year (or calendar year if fiscal year is unavailable) from 1986 to present, please provide the volumes mailed at second-class regular or periodical regular destination delivery office discount rates for each publication listed in response to interrogatory number 1.

**RESPONSE**

ANM does not have the requested information (beyond any responsive information that ANM has previously submitted to the Postal Service in rate and classification cases since 1986). Nonprofit mailers are not asked to provide such information as a condition of membership in ANM. Responsive information for the entire universe of publications entered at second-class or periodical regular rates -- not just the subset entered by ANM members -- should be available on mailing statements in the possession of the Postal Service.

**RESPONSE OF ALLIANCE OF NONPROFIT MAILERS  
TO INTERROGATORIES OF UNITED STATES POSTAL SERVICE**  
[corrected February 6, 1998]

USPS/ANM-8. For each fiscal year (or calendar year if fiscal year is unavailable) from 1986 to present, please provide the volumes mailed at second-class regular or periodical regular destination SCF discount rates for each publication listed in response to interrogatory number 1.

**RESPONSE**

ANM does not have the requested information (beyond any responsive information that ANM has previously submitted to the Postal Service in rate and classification cases since 1986). Nonprofit mailers are not asked to provide such information as a condition of membership in ANM. Responsive information for the entire universe of publications entered at second-class or periodical regular rates -- not just the subset entered by ANM members -- should be available on mailing statements in the possession of the Postal Service.

**RESPONSE OF ALLIANCE OF NONPROFIT MAILERS  
TO INTERROGATORIES OF UNITED STATES POSTAL SERVICE**  
[corrected February 6, 1998]

USPS/ANM-9. For each fiscal year (or calendar year if fiscal year is unavailable) from 1986 to present, please provide the volumes mailed at second-class regular or periodical regular high density discount rates for each publication listed in response to interrogatory number 1.

**RESPONSE**

ANM does not have the requested information (beyond any responsive information that ANM has previously submitted to the Postal Service in rate and classification cases since 1986). Nonprofit mailers are not asked to provide such information as a condition of membership in ANM. Responsive information for the entire universe of publications entered at second-class or periodical regular rates -- not just the subset entered by ANM members -- should be available on mailing statements in the possession of the Postal Service.

**RESPONSE OF ALLIANCE OF NONPROFIT MAILERS  
TO INTERROGATORIES OF UNITED STATES POSTAL SERVICE**  
[corrected February 6, 1998]

USPS/ANM-10. For each fiscal year (or calendar year if fiscal year is unavailable) from 1986 to present, please provide the volumes mailed at second-class regular or periodical regular saturation discount rates for each publication listed in response to interrogatory number 1.

**RESPONSE**

ANM does not have the requested information (beyond any responsive information that ANM has previously submitted to the Postal Service in rate and classification cases since 1986). Nonprofit mailers are not asked to provide such information as a condition of membership in ANM. Responsive information for the entire universe of publications entered at second-class or periodical regular rates -- not just the subset entered by ANM members -- should be available on mailing statements in the possession of the Postal Service.

**RESPONSE OF ALLIANCE OF NONPROFIT MAILERS  
TO INTERROGATORIES OF UNITED STATES POSTAL SERVICE**  
[corrected February 6, 1998]

USPS/ANM-11. For each fiscal year (or calendar year if fiscal year is unavailable) from 1986 to present, please provide the required presort volumes mailed at second-class regular or periodical regular prebarcoded letter size discount rates for each publication listed in response to interrogatory number 1.

**RESPONSE**

ANM does not have the requested information (beyond any responsive information that ANM has previously submitted to the Postal Service in rate and classification cases since 1986). Nonprofit mailers are not asked to provide such information as a condition of membership in ANM. Responsive information for the entire universe of publications entered at second-class or periodical regular rates -- not just the subset entered by ANM members -- should be available on mailing statements in the possession of the Postal Service.

**RESPONSE OF ALLIANCE OF NONPROFIT MAILERS  
TO INTERROGATORIES OF UNITED STATES POSTAL SERVICE**  
[corrected February 6, 1998]

USPS/ANM-12. For each fiscal year (or calendar year if fiscal year is unavailable) from 1986 to present, please provide the volumes mailed at second-class regular or periodical regular prebarcoded flat size discount rates for each publication listed in response to interrogatory number 1.

**RESPONSE**

ANM does not have the requested information (beyond any responsive information that ANM has previously submitted to the Postal Service in rate and classification cases since 1986). Nonprofit mailers are not asked to provide such information as a condition of membership in ANM. Responsive information for the entire universe of publications entered at second-class or periodical regular rates -- not just the subset entered by ANM members -- should be available on mailing statements in the possession of the Postal Service.

**RESPONSE OF ALLIANCE OF NONPROFIT MAILERS  
TO INTERROGATORIES OF UNITED STATES POSTAL SERVICE**  
[corrected February 6, 1998]

USPS/ANM-13. For each fiscal year (or calendar year if fiscal year is unavailable) from 1986 to present, please provide the 3-digit city/5-digit volumes mailed at second-class regular or periodical regular prebarcoded 3-digit letter size discount rates for each publication listed in response to interrogatory number 1.

**RESPONSE**

ANM does not have the requested information (beyond any responsive information that ANM has previously submitted to the Postal Service in rate and classification cases since 1986). Nonprofit mailers are not asked to provide such information as a condition of membership in ANM. Responsive information for the entire universe of publications entered at second-class or periodical regular rates -- not just the subset entered by ANM members -- should be available on mailing statements in the possession of the Postal Service.

**RESPONSE OF ALLIANCE OF NONPROFIT MAILERS  
TO INTERROGATORIES OF UNITED STATES POSTAL SERVICE**  
[corrected February 6, 1998]

USPS/ANM-14. For each fiscal year (or calendar year if fiscal year is unavailable) from 1986 to present, please provide the 3-digit city/5-digit volumes mailed at second-class *regular or periodical regular prebarcoded 5-digit letter size discount rates* for each publication listed in response to interrogatory number 1.

**RESPONSE**

ANM does not have the requested information (beyond any responsive information that ANM has previously submitted to the Postal Service in rate and classification cases since 1986). Nonprofit mailers are not asked to provide such information as a condition of membership in ANM. Responsive information for the entire universe of publications entered at second-class or periodical regular rates -- not just the subset entered by ANM members -- should be available on mailing statements in the possession of the Postal Service.

**RESPONSE OF ALLIANCE OF NONPROFIT MAILERS  
TO INTERROGATORIES OF UNITED STATES POSTAL SERVICE**  
[corrected February 6, 1998]

USPS/ANM-15. For each fiscal year (or calendar year if fiscal year is unavailable) from 1986 to present, please provide the 3-digit city/5-digit volumes mailed at second-class regular or periodical regular prebarcoded flat size discount rates for each publication listed in response to interrogatory number 1.

**RESPONSE**

ANM does not have the requested information (beyond any responsive information that ANM has previously submitted to the Postal Service in rate and classification cases since 1986). Nonprofit mailers are not asked to provide such information as a condition of membership in ANM. Responsive information for the entire universe of publications entered at second-class or periodical regular rates -- not just the subset entered by ANM members -- should be available on mailing statements in the possession of the Postal Service.

**RESPONSE OF ALLIANCE OF NONPROFIT MAILERS  
TO INTERROGATORIES OF UNITED STATES POSTAL SERVICE**  
[corrected February 6, 1998]

USPS/ANM-16. For each fiscal year (or calendar year if fiscal year is unavailable) from 1986 to present, please provide the volume, total weight and advertising weight mailed at second-class regular or periodical regular rates for zones 1&2 for each publication listed in response to interrogatory number 1.

**RESPONSE**

ANM does not have the requested information (beyond any responsive information that ANM has previously submitted to the Postal Service in rate and classification cases since 1986). Nonprofit mailers are not asked to provide such information as a condition of membership in ANM. *Responsive information for the entire universe of publications entered at second-class or periodical regular rates -- not just the subset entered by ANM members -- should be available on mailing statements in the possession of the Postal Service.*

**RESPONSE OF ALLIANCE OF NONPROFIT MAILERS  
TO INTERROGATORIES OF UNITED STATES POSTAL SERVICE**  
[corrected February 6, 1998]

USPS/ANM-17. For each fiscal year (or calendar year if fiscal year is unavailable) from 1986 to present, please provide the volume, total weight and advertising weight mailed at second-class regular or periodical regular rates for zone 3 for each publication listed in response to interrogatory number 1.

**RESPONSE**

ANM does not have the requested information (beyond any responsive information that ANM has previously submitted to the Postal Service in rate and classification cases since 1986). Nonprofit mailers are not asked to provide such information as a condition of membership in ANM. Responsive information for the entire universe of publications entered at second-class or periodical regular rates -- not just the subset entered by ANM members -- should be available on mailing statements in the possession of the Postal Service.

**RESPONSE OF ALLIANCE OF NONPROFIT MAILERS  
TO INTERROGATORIES OF UNITED STATES POSTAL SERVICE**  
[corrected February 6, 1998]

USPS/ANM-18. For each fiscal year (or calendar year if fiscal year is unavailable) from 1986 to present, please provide the volume, total weight and advertising weight mailed at second-class regular or periodical regular rates for zone 4 for each publication listed in response to interrogatory number 1.

**RESPONSE**

ANM does not have the requested information (beyond any responsive information that ANM has previously submitted to the Postal Service in rate and classification cases since 1986). Nonprofit mailers are not asked to provide such information as a condition of membership in ANM. Responsive information for the entire universe of publications entered at second-class or periodical regular rates -- not just the subset entered by ANM members -- should be available on mailing statements in the possession of the Postal Service.

**RESPONSE OF ALLIANCE OF NONPROFIT MAILERS  
TO INTERROGATORIES OF UNITED STATES POSTAL SERVICE**  
[corrected February 6, 1998]

USPS/ANM-19. For each fiscal year (or calendar year if fiscal year is unavailable) from 1986 to present, please provide the volume, total weight and advertising weight mailed at second-class regular or periodical regular rates for zone 5 for each publication listed in response to interrogatory number 1.

**RESPONSE**

ANM does not have the requested information (beyond any responsive information that ANM has previously submitted to the Postal Service in rate and classification cases since 1986). Nonprofit mailers are not asked to provide such information as a condition of membership in ANM. Responsive information for the entire universe of publications entered at second-class or periodical regular rates -- not just the subset entered by ANM members -- should be available on mailing statements in the possession of the Postal Service.

**RESPONSE OF ALLIANCE OF NONPROFIT MAILERS  
TO INTERROGATORIES OF UNITED STATES POSTAL SERVICE**  
[corrected February 6, 1998]

USPS/ANM-20. For each fiscal year (or calendar year if fiscal year is unavailable) from 1986 to present, please provide the volume, total weight and advertising weight mailed at second-class regular or periodical regular rates for zone 6 for each publication listed in response to interrogatory number 1.

**RESPONSE**

ANM does not have the requested information (beyond any responsive information that ANM has previously submitted to the Postal Service in rate and classification cases since 1986). Nonprofit mailers are not asked to provide such information as a condition of membership in ANM. Responsive information for the entire universe of publications entered at second-class or periodical regular rates -- not just the subset entered by ANM members -- should be available on mailing statements in the possession of the Postal Service.

**RESPONSE OF ALLIANCE OF NONPROFIT MAILERS  
TO INTERROGATORIES OF UNITED STATES POSTAL SERVICE**  
[corrected February 6, 1998]

USPS/ANM-21. For each fiscal year (or calendar year if fiscal year is unavailable) from 1986 to present, please provide the volume, total weight and advertising weight mailed at second-class regular or periodical regular rates for zone 7 for each publication listed in response to interrogatory number 1.

**RESPONSE**

ANM does not have the requested information (beyond any responsive information that ANM has previously submitted to the Postal Service in rate and classification cases since 1986). Nonprofit mailers are not asked to provide such information as a condition of membership in ANM. Responsive information for the entire universe of publications entered at second-class or periodical regular rates -- not just the subset entered by ANM members -- should be available on mailing statements in the possession of the Postal Service.

**RESPONSE OF ALLIANCE OF NONPROFIT MAILERS  
TO INTERROGATORIES OF UNITED STATES POSTAL SERVICE  
[corrected February 6, 1998]**

USPS/ANM-22. For each fiscal year (or calendar year if fiscal year is unavailable) from 1986 to present, please provide the volume, total weight and advertising weight mailed at second-class regular or periodical regular rates for zone 8 for each publication listed in response to interrogatory number 1.

**RESPONSE**

ANM does not have the requested information (beyond any responsive information that ANM has previously submitted to the Postal Service in rate and classification cases since 1986). Nonprofit mailers are not asked to provide such information as a condition of membership in ANM. Responsive information for the entire universe of publications entered at second-class or periodical regular rates -- not just the subset entered by ANM members -- should be available on mailing statements in the possession of the Postal Service.

**RESPONSE OF ALLIANCE OF NONPROFIT MAILERS  
TO INTERROGATORIES OF UNITED STATES POSTAL SERVICE**

[corrected February 6, 1998]

USPS/ANM-23. For each fiscal year (or calendar year if fiscal year is unavailable) from 1986 to present, please provide the average percentage of nonadvertising content mailed at second-class regular or periodical regular rates for each publication listed in response to interrogatory number 1.

**RESPONSE**

ANM does not have the requested information (beyond any responsive information that ANM has previously submitted to the Postal Service in rate and classification cases since 1986). Nonprofit mailers are not asked to provide such information as a condition of membership in ANM. Responsive information for the entire universe of publications entered at second-class or periodical regular rates -- not just the subset entered by ANM members -- should be available on mailing statements in the possession of the Postal Service.

**RESPONSE OF ALLIANCE OF NONPROFIT MAILERS  
TO INTERROGATORIES OF UNITED STATES POSTAL SERVICE**  
[corrected February 6, 1998]

USPS/ANM-24. For each fiscal year (or calendar year if fiscal year is unavailable) from 1986 to present, please provide the volumes mailed on pallets at second-class regular or periodical regular rates for each publication listed in response to interrogatory number 1 by the following pallet presort levels:

- (a) 5-digit pallets
- (b) 3-digit pallets
- (c) SCF pallets
- (d) ADC/SDC pallets
- (e) BMC pallets
- (f) Mixed-BMC pallets.

**RESPONSE**

ANM does not have the requested information (beyond any responsive information that ANM has previously submitted to the Postal Service in rate and classification cases since 1986). Nonprofit mailers are not asked to provide such information as a condition of membership in ANM. Responsive information for the entire universe of publications entered at second-class or periodical regular rates -- not just the subset entered by ANM members -- should be available on mailing statements in the possession of the Postal Service.

**RESPONSE OF ALLIANCE OF NONPROFIT MAILERS  
TO INTERROGATORIES OF UNITED STATES POSTAL SERVICE**  
[corrected February 6, 1998]

USPS/ANM-25. For each fiscal year (or calendar year if fiscal year is unavailable) from 1986 to present, for those volumes mailed on pallets at second-class regular or periodical regular rates for each publication listed in response to interrogatory number 1, please provide the average number of pieces per pallet by the following pallet presort levels:

- (a) 5-digit pallets
- (b) 3-digit pallets
- (c) SCF pallets
- (d) ADC/SDC pallets
- (e) BMC pallets
- (f) Mixed-BMC pallets.

**RESPONSE**

*ANM does not have the requested information (beyond any responsive information that ANM has previously submitted to the Postal Service in rate and classification cases since 1986). Nonprofit mailers are not asked to provide such information as a condition of membership in ANM. Responsive information for the entire universe of publications entered at second-class or periodical regular rates -- not just the subset entered by ANM members -- should be available on mailing statements in the possession of the Postal Service.*

**RESPONSE OF ALLIANCE OF NONPROFIT MAILERS  
TO INTERROGATORIES OF UNITED STATES POSTAL SERVICE**  
[corrected February 6, 1998]

USPS/ANM-26. For each fiscal year (or calendar year if fiscal year is unavailable) from 1986 to present, for those volumes mailed on pallets at second-class regular or periodical regular rates for each publication listed in response to interrogatory number 1, please provide the average pallet weight by the following pallet presort levels:

- (a) 5-digit pallets
- (b) 3-digit pallets
- (c) SCF pallets
- (d) ADC/SDC pallets
- (e) BMC pallets
- (f) Mixed-BMC pallets

**RESPONSE**

ANM does not have the requested information (beyond any responsive information that ANM has previously submitted to the Postal Service in rate and classification cases since 1986). Nonprofit mailers are not asked to provide such information as a condition of membership in ANM. Responsive information for the entire universe of publications entered at second-class or periodical regular rates -- not just the subset entered by ANM members -- should be available on mailing statements in the possession of the Postal Service.

**RESPONSE OF ALLIANCE OF NONPROFIT MAILERS  
TO INTERROGATORIES OF UNITED STATES POSTAL SERVICE**  
[corrected February 6, 1998]

USPS/ANM-27. For each fiscal year (or calendar year if fiscal year is unavailable) from 1986 to present, please provide the volumes mailed in sacks at second-class regular or periodical regular rates for each publication listed in response to interrogatory number 1 by the following sack presort levels:

- (a) Carrier route(s) sacks
- (b) Firm sacks
- (c) 5-digit sacks
- (d) 3-digit unique city sacks
- (e) 3-digit sacks
- (f) SCF sacks
- (g) ADC/SDC sacks
- (h) Mixed sacks.

**RESPONSE**

ANM does not have the requested information (beyond any responsive information that ANM has previously submitted to the Postal Service in rate and classification cases since 1986). Nonprofit mailers are not asked to provide such information as a condition of membership in ANM. Responsive information for the entire universe of publications entered at second-class or periodical regular rates -- not just the subset entered by ANM members -- should be available on mailing statements in the possession of the Postal Service.

**RESPONSE OF ALLIANCE OF NONPROFIT MAILERS  
TO INTERROGATORIES OF UNITED STATES POSTAL SERVICE**  
[corrected February 6, 1998]

USPS/ANM-28. For each fiscal year (or calendar year if fiscal year is unavailable) from 1986 to present, for those volumes mailed in sacks at second-class regular or periodical regular rates for each publication listed in response to interrogatory number 1, please provide the average number of pieces per sack by the following sack presort levels:

- (a) Carrier route(s) sacks
- (b) Firm sacks
- (c) 5-digit sacks
- (d) 3-digit unique city sacks
- (e) 3-digit sacks
- (f) SCF sacks
- (g) ADC/SDC sacks
- (h) Mixed sacks.

**RESPONSE**

ANM does not have the requested information (beyond any responsive information that ANM has previously submitted to the Postal Service in rate and classification cases since 1986). Nonprofit mailers are not asked to provide such information as a condition of membership in ANM. Responsive information for the entire universe of publications entered at second-class or periodical regular rates -- not just the subset entered by ANM members -- should be available on mailing statements in the possession of the Postal Service.

**RESPONSE OF ALLIANCE OF NONPROFIT MAILERS  
TO INTERROGATORIES OF UNITED STATES POSTAL SERVICE**  
[corrected February 6, 1998]

USPS/ANM-29. For each fiscal year (or calendar year if fiscal year is unavailable) from 1986 to present, please provide the volumes mailed in trays at second-class regular or periodical regular rates for each publication listed in response to interrogatory number 1 by the following tray presort levels:

- (a) Carrier route(s) trays
- (b) Firm trays
- (c) 5-digit trays
- (d) 3-digit unique city trays
- (e) 3-digit trays
- (f) SCF trays
- (g) ADC/SDC trays
- (h) Mixed trays.

**RESPONSE**

ANM does not have the requested information (beyond any responsive information that ANM has previously submitted to the Postal Service in rate and classification cases since 1986). Nonprofit mailers are not asked to provide such information as a condition of membership in ANM. Responsive information for the entire universe of publications entered at second-class or periodical regular rates -- not just the subset entered by ANM members -- should be available on mailing statements in the possession of the Postal Service.

**RESPONSE OF ALLIANCE OF NONPROFIT MAILERS  
TO INTERROGATORIES OF UNITED STATES POSTAL SERVICE**  
[corrected February 6, 1998]

USPS/ANM-30. For each fiscal year (or calendar year if fiscal year is unavailable) from 1986 to present, for those volumes mailed in trays at second-class regular or periodical regular rates for each publication listed in response to interrogatory number 1, please provide the average number of pieces per tray by the following tray presort levels:

- (a) Carrier route(s) trays
- (b) Firm trays
- (c) 5-digit trays
- (d) 3-digit unique city trays
- (e) 3-digit trays
- (f) SCF trays
- (g) ADC/SDC trays
- (h) Mixed trays.

**RESPONSE**

ANM does not have the requested information (beyond any responsive information that ANM has previously submitted to the Postal Service in rate and classification cases since 1986). Nonprofit mailers are not asked to provide such information as a condition of membership in ANM. Responsive information for the entire universe of publications entered at second-class or periodical regular rates -- not just the subset entered by ANM members -- should be available on mailing statements in the possession of the Postal Service.

**RESPONSE OF ALLIANCE OF NONPROFIT MAILERS  
TO INTERROGATORIES OF UNITED STATES POSTAL SERVICE  
[corrected February 6, 1998]**

USPS/ANM-31. For each fiscal year (or calendar year if fiscal year is unavailable) from 1986 to present, please provide the volumes mailed in bundles at second-class regular or periodical regular rates for each publication listed in response to interrogatory number 1.

**RESPONSE**

ANM does not have the requested information (beyond any responsive information that ANM has previously submitted to the Postal Service in rate and classification cases since 1986). Nonprofit mailers are not asked to provide such information as a condition of membership in ANM. Responsive information for the entire universe of publications entered at second-class or periodical regular rates -- not just the subset entered by ANM members -- should be available on mailing statements in the possession of the Postal Service.

**RESPONSE OF ALLIANCE OF NONPROFIT MAILERS  
TO INTERROGATORIES OF UNITED STATES POSTAL SERVICE**  
[corrected February 6, 1998]

USPS/ANM-32. For each fiscal year (or calendar year if fiscal year is unavailable) from 1986 to present, for those volumes mailed in bundles at second-class regular or periodical regular rates for each publication listed in response to interrogatory number 1, please provide the average number of pieces per bundle.

**RESPONSE**

ANM does not have the requested information (beyond any responsive information that ANM has previously submitted to the Postal Service in rate and classification cases since 1986). Nonprofit mailers are not asked to provide such information as a condition of membership in ANM. Responsive information for the entire universe of publications entered at second-class or periodical regular rates -- not just the subset entered by ANM members -- should be available on mailing statements in the possession of the Postal Service.

**RESPONSE OF ALLIANCE OF NONPROFIT MAILERS  
TO INTERROGATORIES OF UNITED STATES POSTAL SERVICE**  
[corrected February 6, 1998]

USPS/ANM-33. For each fiscal year (or calendar year if fiscal year is unavailable) from 1986 to present, please provide the volumes mailed at second-class regular or periodical regular rates that were plant loaded in USPS provided transportation for each publication listed in response to interrogatory number 1.

**RESPONSE**

ANM does not have the requested information (beyond any responsive information that ANM has previously submitted to the Postal Service in rate and classification cases since 1986). Nonprofit mailers are not asked to provide such information as a condition of membership in ANM. Responsive information for the entire universe of publications entered at second-class or periodical regular rates -- not just the subset entered by ANM members -- should be available on mailing statements in the possession of the Postal Service.

**RESPONSE OF ALLIANCE OF NONPROFIT MAILERS  
TO INTERROGATORIES OF UNITED STATES POSTAL SERVICE**  
[corrected February 6, 1998]

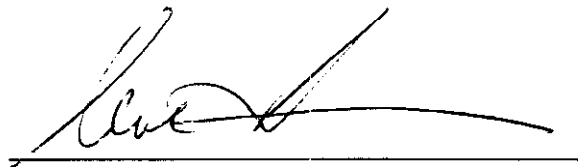
USPS/ANM-34. Please also provide all data furnished in response to interrogatories 1 through 33 above in electronic format.

**RESPONSE**

Not applicable.

## DECLARATION

I, Neal Denton, hereby declare under penalties of perjury that I am executive director of the Alliance of Nonprofit Mailers, and that the attached responses to Interrogatories USPS/ANM-1 through -34 in Docket No. R97-1 are true to the best of my knowledge, information, and belief.

A handwritten signature in black ink, appearing to read "Neal Denton", is written over a horizontal line.

February 5, 1998

## CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document on all participants of record in this proceeding in accordance with section 12 of the Rules of Practice.

David M. Leary

February 6, 1998